

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|--|---|------------------------|
| ADVOCATE HEALTH CARE NETWORK, <i>et al.</i> |) | |
| |) | |
| |) | Case No. 1:25-CV-02419 |
| <i>Plaintiffs,</i> |) | |
| |) | Hon. Steven C. Seeger |
| v. |) | |
| |) | |
| SPECWORKS, INC., <i>et al.</i> , |) | |
| |) | |
| <i>Defendants.</i> |) | |
| |) | |
| ----- |) | |
| SPECWORKS, INC., <i>et al.</i> , |) | |
| |) | |
| <i>Defendants/Counterclaimants,</i> |) | |
| |) | |
| v. |) | |
| |) | |
| ADVOCATE HEALTH CARE NETWORK, <i>et al.</i> |) | |
| |) | |
| |) | |
| <i>Plaintiffs/Counter-Defendants.</i> | / | |

**DEFENDANTS' MOTION FOR LEAVE TO FILE REPLY TO PLAINTIFFS' RESPONSE
IN OPPOSITION TO DEFENDANT CORINA PEACOCK'S MOTION TO DISMISS
UNDER SEAL**

NOW COMES Defendants SPECWORKS, INC. (“SpecWorks”), and CORINA PEACOCK (“Ms. Peacock”) (collectively “Defendants”), by and through their undersigned counsel, and hereby files their Motion for Leave to file their Reply to Plaintiffs’ Response in Opposition to Defendant Corina Peacock’s Motion to Dismiss under seal pursuant to Fed. R. Civ. P. 26(c) and Local Rule 26.2. As set forth below, the Confidential Materials relate to a confidential agreement entered into between the parties that is governed by a confidentiality clause in the Agreement (Exhibit C attached to Complaint).

There is good cause to grant this Motion to Seal because public disclosure of these confidential materials would cause irreparable commercial harm to all parties of this litigation. Moreover, this Court has previously ruled that moving to seal limited and specific portions—rather than a document in its entirety—is permitted. See *Motorola Sols., Inc. v. Hytera Commc'ns Corp.*, 367 F. Supp. 3d 813, 817 (N.D. Ill. 2019). Specifically, this Honorable Court has allowed Exhibit C attached to Plaintiffs' Complaint, Dkt. 1, to be sealed as it contains the original confidential Agreement between the parties. Further, this Honorable Court has allowed redactions of filings that pertain to citations of Exhibit C attached to Plaintiffs' complaint.

Defendants' Reply to Plaintiffs' Response in Opposition to Defendant Corina Peacock's Motion to Dismiss references the confidential Agreement and other contract details containing the same confidentiality clause.

WHEREFORE, Defendants SpecWorks and Corina Peacock's Motion for Leave to File Documents under Seal should be granted pursuant to Fed. R. Civ. P. 26(c) and Local Rule 26.2.

Dated: June 27, 2025

Respectfully submitted,

ABIGAIL SCHMITZ LAW, LLC

/s/ Abigail Schmitz _____
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